

Follow Up Responses for *Texas Tribune*
October 3, 2019
Final

The total San Miguel Electric Cooperative Permit 11G is 16,002 acres. Of this 16,002 acres, approximately 5,960 acres are under lease by San Miguel from the Peelers. Of the approximately 5,960 acres on lease from the Peelers, approximately 1,275 acres are undisturbed. Of the 4,680 that have been disturbed, 3,342 acres have been reclaimed and are in some form of bond release or have reached Phase III Bond Release. That represents 71% of the total disturbed acreage on the Peeler property that is in the process or through to the final phase of reclamation to pastureland in full compliance with permitted timelines and applicable regulations.

As I mentioned during our phone call, the interim “post-mine land use” change you inquired about (from pastureland to industrial/commercial [I/C]) was at the request of the Railroad Commission of Texas. I was present at the meetings where that request was made and our meeting notes confirm that fact.

As I also explained, San Miguel has never altered its reclamation goals or actions based on the interim I/C designation as evidenced by the significant acreage that has been already returned to pastureland despite its I/C designation. Contrary to your stated concerns that reclamation is not occurring on the Peeler lease, the record and actions of San Miguel demonstrate that 71% of the disturbed Peeler acreage is in the bond release process, which means it has already been reclaimed and planted with vegetation to comply with pastureland designation. San Miguel is monitoring vegetation sustainability, along with other bond release obligations to reach Phase III (final) bond release status based on pastureland designation in the coming years.

Mike Nasi, environmental counsel for San Miguel Electric Cooperative